

EXHIBIT N

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LINDA JANN LEWIS, MADISON LEE,
ELLEN SWEETS, BENNY ALEXANDER,
GEORGE MORGAN, VOTO LATINO,
TEXAS STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
and TEXAS ALLIANCE FOR RETIRED
AMERICANS,

Plaintiffs,

vs.

RUTH HUGHS, in her official capacity as
Texas Secretary of State,

Defendant.

Civil Action No. 5:20-cv-00577

Related to *Gloria et al. v. Hughs et al.*,
No. 5:20-cv-00527

DECLARATION OF GARY BLEDSOE IN SUPPORT OF PLAINTIFFS' MOTION

Pursuant to 20 U.S.C. § 1746, I, Gary Bledsoe, declare as follows:

1. My name is Gary Bledsoe. I am over the age of 18, have personal knowledge of the facts stated in this declaration, and can competently testify to their truth.

2. I am the President of the Texas Conference of the National Association for the Advancement of Colored People (“TX-NAACP”), a 501(c)(4) nonprofit, social welfare organization whose mission is to secure the political, educational, social, and economic equality of black Americans. The TX-NAACP represents the interests of more than 10,000 members in Texas, as well as the over 2 million likely black registrants to vote in the 2020 general election.

3. Fundamental to its mission is the TX-NAACP’s work to ensure that all people of color, and black voters specifically, are enfranchised and included in the democratic process. It therefore strives to increase civic participation among black voters by engaging in voter education

and registration activities such as Project VIER (“Voter Information, Education, and Registration”) in churches, neighborhoods, and on college campuses across the state to reach voters and help them to register and eventually vote. Project VIER was created in 2015 to celebrate the 100-year anniversary of the Voting Rights Act. In 2018, the TX-NAACP also conducted a voter protection campaign and engaged in legislative activity related to Texas’s voter identification law and other voting rights issues.

4. In the 2020 election cycle, the COVID-19 pandemic has affected TX-NAACP’s prioritization of different voting rights issues. Because black Americans are contracting COVID-19 and suffering its devastating effects at a disproportionately high rate, TX-NAACP is aware of the need to protect this group from unnecessary exposure. It has therefore invested time, energy, and resources in a vote-by-mail campaign. This campaign has included filing an amicus brief in the Texas Supreme Court raising the fact that it is necessary for those individuals with underlying health conditions to be able to vote by mail in November 2020 because of the public health crisis. TX-NAACP’s local branches are also holding remote Get Out The Vote events, such as phone banking to educate Texans on applying to vote by mail.

5. But *applying* to vote by mail is not the only challenge to black voters in Texas. There are also significant risks that many mail-in ballots will go uncounted. These risks include voters not timely receiving their mail-in ballots, marked mail-in ballots not being mailed or not being delivered to county election administrators for want of sufficient postage, mail-in ballots not being postmarked by 7 p.m. on election day and delivered to county election administrators by 5 p.m. the day after the election, and mail-in ballots being rejected for signature mismatch reasons. The likelihood of such risks leading to disenfranchisement is heightened for TX-NAACP’s members because of multiple factors, including the failure to receive vote-by-mail ballots due to

housing instability and displacement related to economic hardship or job loss, the cost or time to acquire proper postage, and ballots not being delivered by the deadline for any number of reasons, such as voter inexperience with how long it takes for mail to be delivered.

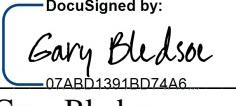
6. Because of these concerns, TX-NAACP's vote-by-mail campaign also educates Texans on the hurdles in having one's mail-in ballot counted in the hopes that our members will be able to navigate the arbitrary burdens in Texas election law. This discussion includes educating voters on the Postage Tax, Ballot Receipt Deadline, Signature Match Requirement, and Voter Assistance Ban (together, "Challenged Provisions") that are at issue in this case. Because TX-NAACP understands that there will be an unprecedented influx of voting by mail this November due to the COVID-19 pandemic, it has determined that educating voters on these hurdles is imperative. Indeed, all of the work that TX-NAACP does to register black voters and inform them on how to apply to vote by mail means little if their mail-in ballots are not counted because of the Challenged Provision's arbitrary restrictions.

7. Should the Challenged Provisions remain in effect, TX-NAACP intends to expend additional resources and staff time to educate Texas's black voters on when and how to cast their mail-in ballots. Specifically, TX-NAACP has had to dedicate an enormous amount of time toward educating black voters on the Challenged Provisions. Were the Challenged Provisions invalidated, TX-NAACP would reallocate resources—including the time of over 350,000 volunteers in Texas—that will now go to educating black voters on those provisions, to other activities, such as registering new voters, engaging in GOTV activities (it had aimed to target over 600,000 black voters in Texas for the 2020 general election), and ensuring that it can reach more black voters to educate them on how to apply to vote by mail. TX-NAACP has limited resources to do its work,

and any resources spent on voter education about the Challenged Provisions necessarily takes away from its other key activities.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: June 17, 2020

DocuSigned by:
By: 
Gary Bledsoe
President
Texas Conference of the NAACP